



August 1, 2016

Office of General Counsel
Federal Election Commission
999 E. Street, NW
Washington, D.C. 20463

**RE: Complaint against Ronald E. Russell, Candidate for
Delegate to Congress from the United States Virgin Islands**

TO THE FEDERAL ELECTION COMMISSION:

Pursuant to 11 C.F.R. § 111.4, Virgin Islands for Plaskett (“Complainant”) files this complaint against Ronald E. Russell (“Respondent”), candidate for Delegate to the United States House of Representatives from the United States Virgin Islands (“Delegate to Congress”). In support of its complaint, Complainant states as follows:

FACTUAL BACKGROUND

1. Respondent is running to serve as the Delegate to Congress. See <http://www.vivote.gov/content/2016-candidate-listings> (“2016 STX Candidate Listings.xlsx”).
2. Respondent is currently a candidate in the Virgin Islands primary election for the Democratic Nomination to run for Delegate to Congress in the general election in November 2016. See <http://www.vivote.gov/sites/default/files/2016%20Primary%20Election%20STX%20Sample%20Ballot.pdf> (Sample Primary Election Ballot).

3. The Virgin Islands primary election is scheduled to occur on Saturday, August 6, 2016. See <http://vivote.gov/>

4. Respondent is a practicing attorney who is licensed to practice law in the United States Virgin Islands. Respondent states on his campaign website that he is the former attorney for the Democratic Party of the Virgin Islands. See <http://www.ronaldrussellforcongress.com/meet-ronald>.

5. Respondent served four terms as a Virgin Islands Senator, having been a Member of the 25th, 26th, 27th, and 29th Legislatures of the Virgin Islands. He also served as President of the 29th Legislature. Id.

6. Respondent has been vigorously campaigning, for a period of months, to serve as Delegate to Congress.

7. Respondent has campaigned across a wide variety of media, including, but not limited to:

7.1. voluminous radio advertising, informally monitored, and calculated to be approximately (at least) eight (8) campaign spots per day,

7.2. a campaign website, <http://www.ronaldrussellforcongress.com/>,

7.3. a campaign Facebook page,

<https://www.facebook.com/ronaldrussellforcongress/?fref=ts>,

7.4. paid radio talk Shows,

7.5. press releases, and

7.6. a YouTube channel complete with campaign video advertisements,

<https://www.youtube.com/channel/UCihk3QfpwurJ44icD0JBK5w>.



RELEVANT FEDERAL CAMPAIGN FINANCE LAW AND REGULATION

8. Under federal campaign finance laws, an individual who seeks nomination for election to federal office becomes a “candidate” when “[t]he individual has received contributions aggregating in excess of \$5,000 or made expenditures aggregating in excess of \$5,000.” 11 C.F.R. § 100.3(a)(1).

9. Under federal campaign finance laws, an individual who seeks nomination for election to federal office can also become a “candidate” when “[t]he individual has given [his] consent to another person to receive contributions or make expenditures on behalf of that individual and such person has received contributions aggregating in excess of \$5,000 or made expenditures aggregating in excess of \$5,000.” 11 C.F.R. § 100.3(a)(2).

10. Once an individual becomes a candidate for federal office under 11 C.F.R. § 100.3, federal campaign finance laws require registration with the Federal Election Commission as a candidate and designation of a principal campaign committee. 11 C.F.R. § 101(a) and 102.12(a).

11. Not later than fifteen (15) days after becoming a candidate, every candidate must file a Statement of Candidacy (FEC Form 2), on which the candidate designates a principal campaign committee and any other authorized committees. Id.

12. Not later than ten (10) days after designating a principal campaign committee, the committee must file a Statement of Organization (FEC Form 1), on which the committee identifies the committee’s name, address, treasurer and other officers, and bank depository. 11 C.F.R. § 102.1(a).

13. The committee must have a treasurer before it accepts contributions or makes expenditures. 11 C.F.R. § 102.7(a) and (b).



14. Once registered, a candidate's principal campaign committee must file periodic reports of contributions and disbursements. See, generally, 11 C.F.R. Part 104.

15. Quarterly reports must be filed no later than April 15, July 15 and October 15. 11 C.F.R. § 104.5(a)(1)(i).

16. A "pre-election" report "must be filed no later than 12 days before" any primary election in which the candidate is running and "must disclose all receipts and disbursements as of the 20th day before a primary" election. 11 C.F.R. § 104.5(a)(2)(i)(A) and (B).

RONALD RUSSELL'S FLAGRANT VIOLATIONS OF LAW

17. Upon information and belief based on regular monitoring of the FEC's website and various search options enabled thereon, Respondent has done absolutely nothing required of a candidate for federal office.

18. Searches performed on the FEC's website do not reveal any filings whatsoever related to Respondent's candidacy or campaign for the office of Delegate to Congress:

18.1. Respondent has not registered as a candidate;

18.2. Respondent has not designated a principal campaign committee;

18.3. Respondent has not designated a Treasurer for his (unregistered and, potentially, nonexistent) principal campaign committee;

18.4. Respondent did not file a quarterly report due on July 15, 2016;

18.5. Respondent did not file a pre-election report that was due on Monday July 25, 2016.

19. Upon information and belief, based on external observation and monitoring of Respondent's campaign – especially the amount of radio advertising being broadcast by



Respondent – it is financially impossible that Respondent has not crossed the \$5,000 threshold to becoming a “candidate” for public office under 11 C.F.R. § 100.3(a).

20. Especially as a practicing attorney, former four-term Virgin Islands Senator and self-proclaimed former counsel for the Democratic Party of the Virgin Islands, Respondent’s failure to file a single report with the FEC related to his candidacy and campaign for federal office is, at best, a flagrant violation of federal campaign finance law and regulation. Given Respondent’s career as an attorney and former senator, his failure to adhere to even the most basic FEC regulations is likely a knowing and intentional violation of law.

WHEREFORE, Complainant respectfully requests that the Federal Election Commission (i) fully investigate the activities of Respondent, to include a full accounting of all contributions received and disbursements made, and (ii) issue appropriate sanctions and penalties against Respondent as provided for under federal election law and regulation.

Respectfully submitted,

VIRGIN ISLANDS FOR PLASKETT

Dated: 8/1/16

By: [Signature]
Conrad E. Francois II
Territorial Campaign Manager
P.O. Box 26502
Christiansted, VI 00824
plaskettforcongress@gmail.com

The foregoing Complaint was sworn to and subscribed before me this 1st day of August, 2016.

Gregory J. Ferguson
Notary Public LNP-12-14
Commission Expires 05/29/18
St. Thomas/St. John, USVI

[Signature]
Notary Public
Print Name: GREG J. FERGUSON
License No. _____
My Commission Expires: _____